

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

CECIL KENTON CAROLUS TRUSTEE OF	§	
THE BERTHA A CAROLUS REVOCABLE	§	No. 22-cv-01234
LIVING TRUST AND HEIRS OF BERTHA	§	
CAROLUS	§	REMOVAL FROM
Plaintiff	§	BEXAR COUNTY, TEXAS
vs.	§	
JAMES B. NUTTER & COMPANY	§	407 <sup>TH</sup> JUDICIAL DISTRICT
Defendant	§	CAUSE NO. 2022-CI-21437
	§	

**DEFENDANT JAMES B. NUTTER & COMPANY's**  
**INITIAL DISCLOSURES**

Pursuant to *Fed. R. Civ. Pro. 26(a)* please be advised as follows:

**1. Persons With Discoverable Information**

The following persons are likely to have discoverable information concerning the subject matter of this proceeding.

JAMES B. NUTTER & COMPANY  
AL PITZNER, SENIOR VICE PRESIDENT-CHIEF COMPLIANCE/LEGAL OFFICER  
4153 BROADWAY STREET  
KANSAS CITY, MO 64111  
(816) 968-7177  
[al.pitzner@nutterhomeloans.com](mailto:al.pitzner@nutterhomeloans.com)

This party is likely to have information concerning the origination and servicing of the subject loan.

CECIL KENTON CAROLUS  
4900 TIMBER TRACE STREET  
SAN ANTONIO, TEXAS 78250

These parties are likely to have information concerning the allegations of the Petition.

Defendant at this time knows of no other persons who are likely to have discoverable information concerning the subject matter of this proceeding.

**2. Copy of Documents**

Defendant hereby produces for Plaintiff a copy of all documents, electronically stored information, and tangible things which Defendant at this time has in its possession, custody, or control.

**3. Computation of Damages**

Defendant is not at this time aware of any damages which it claims in this proceeding, other than for its reasonable attorney fees and costs of court. *Texas Civil Practice and Remedies Code §§ 37.009 and 38.001, Fed R. Civ Pro. 11(b).*

**4. Insurance Agreement**

Defendant is at this time unaware of any insurance agreement regarding the subject matter of Plaintiff's Petition.

**5. Expert Witness**

Defendant does not at this time intend to call an expert witness at trial.

**6. Written Report**

Defendant does not at this time intend to call a witness to provide a written report at trial.

**7. Witnesses**

Defendant does not, other than the persons listed above, at this time intend to call witnesses who will not provide a written report at trial.

**8. Supplement**

Defendant will supplement this disclosure as required.

Date: November 11, 2022

Respectfully Submitted,

MICHAEL J. SCHROEDER, P.C.

/s/ Michael J. Schroeder

Michael J. Schroeder

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ATTORNEYS FOR JAMES B. NUTTER &  
COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was electronically served on all counsel of record on November 11, 2022.

/s/ Michael J. Schroeder

Michael J. Schroeder